

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**NAVAJO NATION, a federally recognized
Indian Tribe; NAVAJO NATION HUMAN
RIGHTS COMMISSION; LORENZO
BATES; JONNYE KAIBAH BEGAY;
GLORIA ANN DENNISON; TRACY DEE
RAYMOND; and BESSIE YAZZIE
WERITO,**

Plaintiffs,

v.

Case 1:22-cv-00095-JB-JSR

**SAN JUAN COUNTY, NEW MEXICO;
SAN JUAN COUNTY BOARD OF
COMMISSIONERS; JOHN BECKSTEAD,
in his official capacity as Chairman; TERRI
FORTNER, in her official capacity as
Commissioner; STEVE LANIER, in his
official capacity as Commissioner;
MICHAEL SULLIVAN, in his official
capacity as Commissioner; GLOJEAN
TODACHEENE, in her official capacity as
Commissioner; and TANYA SHELBY, in
her official capacity as COUNTY CLERK,**

Defendants.

**PLAINTIFFS' SECOND UNOPPOSED MOTION TO EXTEND D.N.M.LR-CIV. 26.6
DEADLINE**

Plaintiffs, through their counsel, respectfully request that the Court extend the deadline to proceed under D.N.M.LR-Civ. 37.1 as directed by D.N.M.LR-Civ. 26.6. to November 14, 2022.¹

1. On October 3, 2022, Plaintiffs filed their first unopposed motion to extend D.N.M.LR-Civ. 26.6 deadline to October 20, 2022, to allow the Parties to meet and confer on

¹ Pursuant to D.N.M.LR-Civ. 7.1(a) Plaintiffs provided a copy of this motion to Defendants to request their concurrence on October 19, 2022, and Defendants do not oppose.

October 13, 2022, following the mediation on October 11, 2022. The court has not yet ruled on this motion.

2. On October 13, 2022, the Plaintiffs met with the Defendants and exchanged their views on the issues raised in their respective meet and confer letters through a Zoom conference call, during which Defendants agreed to exchange a responsive letter to Defendants by October 18, 2022, and to supplement their discovery responses on October 21, 2022, to the extent issues were resolved. The Plaintiffs agreed to the same.
3. Therefore, there is good cause to extend Plaintiffs' D.N.M.LR-Civ 26.6 deadline to allow Plaintiffs additional time to comply with Rule 37(a) Fed. R. Civ. P. and review the responsive letter and potential supplementation from the Defendants before Plaintiffs must proceed under D.N.M.LR-Civ. 37.1.

Plaintiffs respectfully request the Court to extend Plaintiffs' D.N.M.LR-Civ. 26.6 deadline to November 14, 2022.

October 20, 2022

Respectfully Submitted,

/s/ **Leon Howard**

Leon Howard

Preston Sanchez

ACLU OF NEW MEXICO

Doreen N. McPaul (Bar No. 17836)

Navajo Nation Attorney General

Paul Spruhan (Bar No. 12513)

Assistant Attorney General

Louis Mallette (Bar No. 149453)

NAVAJO NATION DEPARTMENT OF
JUSTICE

Ezra D. Rosenberg*

James T. Tucker**

Ryan Snow*

LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW

Raymond M. Williams*

Jean Gabat*

Daniel Nettles*

Virginia Weeks*

Tamara Hilmi Sakijha*

DLA PIPER LLP (US)

Chad W. Dunn

Sonni Waknin

Bernadette Reyes

UCLA VOTING RIGHTS PROJECT

*Pro hac vice applications pending.

** Practice Limited to Federal Court

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October 2022, a true and correct copy of the foregoing was served electronically via the CM/ECF system to all counsel of record.

/s/ Leon Howard
Leon Howard